

Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively, "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with their Joint Letter Brief on Whether YouTube Must Designate Additional Custodians (the "Joint Letter Brief") and its exhibit filed on May 15, 2024. ECF Nos. 848-849.

The Parties have met and conferred regarding the proposed sealing designations. At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the following charts.

I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR PROVISIONAL REDACTIONS

Dkt. No.	Description	Requested Action	Designating Party	YouTube's Basis for Sealing	Previously Sealed
848	Joint Letter Brief on Whether YouTube Must Designate Additional Custodians	Maintain redactions at 1, 2, 3.	YouTube	YouTube seeks to redact personal identifying information such as job titles, job descriptions, and direct quotes of YouTube employees proposed or designated to be document custodians in this case. Disclosure of YouTube employees' identities violates their privacy interests and could cause them to receive threatening contact from the public. Indeed, YouTube employees have previously been identified, doxxed, harassed, and threatened due to their mere connection to YouTube's public	No.

Dkt. No.	Description	Requested Action	Designating Party	YouTube's Basis for Sealing	Previously Sealed
				filings in litigation. Chiou Decl. ¶ 4.	
849	Exhibit A to Joint Letter Brief	Maintain under seal	YouTube	<p>Exhibit A to the Joint Letter Brief contains substantial personal identifying information for 69 YouTube employees who have been proposed or designated to be document custodians in this case.</p> <p>Exhibit A contains descriptive information—including direct quotes from the employees, job titles and descriptions, and other personally identifiable information—that could reveal the private identities of YouTube's employees.</p> <p>All this information is also presented in a single, easily accessible chart with explicit reference to the present litigation that may serve as a roadmap for potential bad actors to identify, doxx, harass, and threaten YouTube's employees as they have historically done. Chiou Decl. ¶ 4.</p>	No.

The Parties therefore agree that the above information may be sealed in connection with the Joint Letter Brief.

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: May 29, 2024

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Brian M. Willen
Brian M. Willen (*pro hac vice*)
WILSON SONSINI GOODRICH & ROSATI PC
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

Lauren Gallo White (State Bar No. 309075)
Samantha A. Machock (State Bar No. 298852)
WILSON SONSINI GOODRICH & ROSATI PC
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
Email: smachock@wsgr.com

Christopher Chiou (State Bar No. 233587)
Matthew K. Donohue (State Bar No. 302144)
WILSON SONSINI GOODRICH & ROSATI PC
953 East Third Street, Suite 100
Los Angeles, CA 90013
Telephone: (323) 210-2900
Facsimile: (866) 974-7329
Email: cchiou@wsgr.com
Email: mdonohue@wsgr.com

*Attorneys for Defendants YouTube, LLC and
Google LLC*

DATED: May 29, 2024

By: /s/ Lexi J. Hazam
LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
Telephone: 415-956-1000
lhazam@lchb.com

PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
55 Challenger Road, 6th floor
Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel and Settlement
Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT
**BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.**
234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. Garden Street, 9th Floor
Pensacola, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

Federal/State Liaison Counsel

MATTHEW BERGMAN
SOCIAL MEDIA VICTIMS LAW CENTER
821 Second Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 Madison Ave, 7th Floor
New York, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 Walnut Street Suite 500
Philadelphia, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

Plaintiffs' Steering Committee Leadership

RON AUSTIN
RON AUSTIN LAW
400 MANHATTAN BLVD
HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

PAIGE BOLDT
WATTS GUERRA LLP
4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com

THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701 1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY, PSC
2380 Grandview Drive
Ft. Mitchell, KY 41017
Telephone: 888-606-5297

semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: (646) 666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.
HENDY JOHNSON VAUGHN EMERY, PSC
600 West Main Street, Suite 100
Louisville, KY 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

SIN-TING MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 East Main Street, Suite 200
Pensacola, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 Hudson Yards, 11th floor
New York, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212.213.8311
hnappi@hrsclaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 South Baylen Street, Suite 600
Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, P.C.
1500 Rosecrans Ave., Ste. 500
Manhattan Beach, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.

1 15910 Ventura Boulevard, Suite 1600
2 Encino, CA 91436
3 Telephone: (818) 839-2333
4 Facsimile: (818) 986-9698
5 rtellis@baronbudd.com
6 dfernandes@baronbudd.com

7 MELISSA YEATES
8 JOSEPH E. MELTZER
9 **KESSLER TOPAZ MELTZER & CHECK, LLP**
10 280 King of Prussia Road
11 Radnor, PA 19087
12 Telephone: 610-667-7706
13 myeates@ktmc.com
14 jmeltzer@ktmc.com

15 DIANDRA “FU” DEBROSSE ZIMMERMANN
16 **DICELLO LEVITT**
17 505 20th St North Suite 1500
18 Birmingham, Alabama 35203
19 Telephone: 205.855.5700
20 fu@dicellolevitt.com

21 Plaintiffs’ Steering Committee Membership

22 *Attorneys for Plaintiffs*

ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: May 29, 2024

By: /s/ Christopher Chiou
Christopher Chiou

MDL No. 3047

CASE NO.: 4:22-md-03047-YGR

~~PROPOSED~~ ORDER ON
DEFENDANTS YOUTUBE, LLC AND
GOOGLE LLC'S OMNIBUS MOTION
TO SEAL

Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

**~~PROPOSED~~ ORDER ON
DEFENDANTS YOUTUBE, LLC AND
GOOGLE LLC'S OMNIBUS MOTION
TO SEAL**

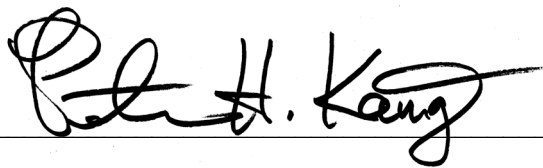
Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion To File Under Seal; Setting Sealing Procedures (Dkt. No. 341), and after consideration of the moving, opposition, and reply papers, supporting declarations, the arguments of counsel, and all other matters presented to the Court, the Court rules that good cause exists to seal portions of the following documents relating to Joint Letter Brief on Whether YouTube Must Designate Additional Custodians:

Dkt. No.	Description	Requested Action	Court's Ruling
848	Joint Letter Brief on Whether YouTube Must Designate Additional Custodians	Maintain redactions at 1, 2, 3.	Granted <u> x </u> Denied <u> </u>
849	Exhibit A to Joint Letter Brief on Whether YouTube Must Designate Additional Custodians.	Seal in entirety.	Granted <u> x </u> Denied <u> </u>

IT IS SO ORDERED.

DATED: May 30, 2024



HONORABLE PETER H. KANG
UNITED STATES MAGISTRATE JUDGE